

## **Exhibit O**

**Estate of Donna M. Siciliano**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

AFFIDAVIT OF  
MICHAEL J. IPPOLITO  
ON BEHALF OF  
DONNA SICILIANO'S ESTATE

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )  
: SS.:  
COUNTY OF RICHMOND )

MICHAEL J. IPPOLITO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 104 Florence Place, Staten Island, New York 10309.

2. I am the brother of Donna Siciliano, and I am pursuing a solatium claim, based on Donna's illness and death, in the within action.

3. Donna's husband, Gerard Siciliano, was also a plaintiff in this action pursuing a solatium claim and a claim on behalf of Donna's estate. However, Gerard passed away on November 7, 2020, subsequent to the commencement of the within action. Due to the death of Gerard Siciliano, I am now the proposed Administrator of Donna's estate.

4. Accordingly, I submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my sister, Donna's estate.

5. My sister passed away from lung cancer on August 19, 2013, at the age of 62. It was determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

6. Donna was a beautiful person and an amazing sister. She was eleven years older than me, so she was like a second mother to me. Growing up, she would always help me with my homework. She would try to keep me out of trouble, despite my best efforts to stay in it. I remember when I was a teen, she would come home from a night out of dancing and wake me up at 3:00 a.m. to get breakfast. As we got older, we stayed close. She developed a similar, motherly relationship with my children.

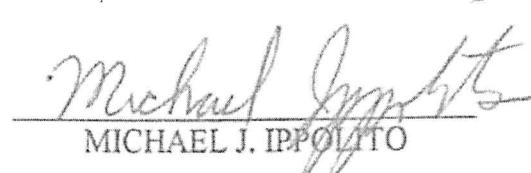
7. In September 2001, Donna lived in a high-rise apartment in Gateway Plaza, located at 395 South End Avenue in Battery Park City, and worked for the New York Stock Exchange, located at 11 Wall Street. On September 11<sup>th</sup>, Donna evacuated the building around the time the first tower collapsed. She ran for her life to the East River. She was covered in soot from the dust cloud and had to get hosed down by the Fire Department. I picked Donna up from a friend's house in the city and brought her back to my house. Donna returned to her apartment to find it destroyed—the windows were shattered, and her apartment was covered with dust. She stayed with us until September 17<sup>th</sup>, when she was able to go back to her workplace. I tried to convince her not to move back to the city because I knew the air wasn't safe. Although Donna felt that living in the exposure zone and walking through the ruins of the World Trade Center every day was depressing, she continued to live in the city for about three years, before moving into an apartment that I built for her in my basement.

8. In early 2010, Donna started to complain of neck and back pain. At first, she attributed it to the arrangement of her home office and thought maybe it was causing her to have bad posture. Donna saw a doctor and was prescribed a muscle relaxant, which didn't offer her much relief. She then started to develop a nasty cough. The doctors recommended a lung X-Ray, which revealed that she had Stage IV lung cancer. Further testing showed that the cancer had spread to her brain. She came home from the doctor and told me the devastating news. That was the only time I ever saw her cry.

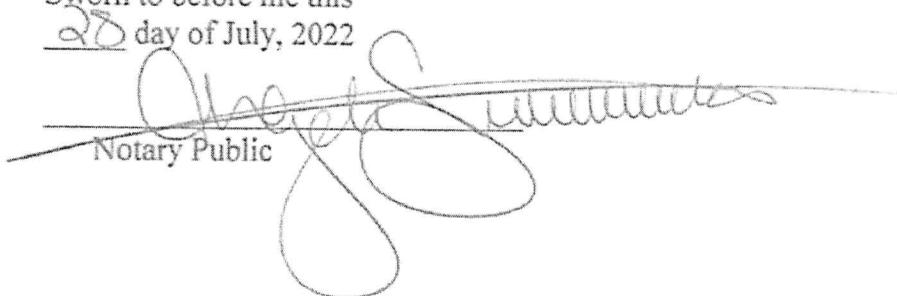
9. Donna lived in my home during the time she was ill. My family and I would take her shopping and cook for her. We would take her to doctors' appointments, treatments, and scans. We did everything we could to help support her. She had always done so much for everyone throughout her life, and she deserved to have things done for her when she was sick. We had a tradition since childhood of going out to breakfast every week. One of the last times

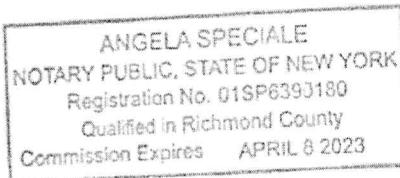
we had breakfast, she got sick in the restaurant as we were sitting at the table. I could see changes in her health taking place. Donna was always in pain and soon became bedridden. A few weeks before she passed, her leg started to turn black.

9. Donna was a wonderful person who was beloved by all who knew her, including everyone at the New York Stock Exchange. She ran a toy drive at Christmastime and made sure that every broker there was involved. She was involved in raising money for many causes. She was a special person who was well-known and well-loved. She was a beautiful woman, inside and out, and had a great personality. The fact that she suffered so greatly and lost her life to this devastating illness is something that is incomprehensible.

  
MICHAEL J. IPPOLITO

Sworn to before me this  
28 day of July, 2022

  
Notary Public



**Estate of Stephen E. Skipton Sr.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF SOUTH CAROLINA )  
: SS.:  
COUNTY OF BERKELEY )

JENNIFER SKIPTON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 409 Whispering Breeze Lane, Summerville, SC 29486.
2. My current age is 46, having been born on August 24, 1975
3. I am the wife of Stephen E. Skipton Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from metastatic urothelial cancer on August 23, 2014. It was determined that this illness was causally connected to their exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On December 28, 2016, I was appointed personal representative of my husband's estate by the County of Berkeley, South Carolina Probate Court.
6. My marriage to Stephen was a great one. We had a very happy life together. We had twin daughters, and our family was our life. Stephen was a very active father who loved bike riding and traveling. Traveling was one of our favorite activities to do together. He was

always finding fun activities for us to do. Stephen would take on extra jobs in order to support our family, but we would always coordinate days off during the week in order to have weekly dates. He was truly my best friend. We did everything together. We would talk all day, every day.

7. Stephen and I were not together in 2001. He never talked to me about his experiences on 9/11 until after he became sick. Even then, he didn't share much. He arrived at the World Trade Center site within 2-3 hours of the plane crashes. He went to work helping to coordinate the search and rescue at the communications center. He would continue to return to the WTC site in the same capacity for UMDNJ for another 2-3 weeks.

8. Stephen was the kind of person who was rarely ever sick. At first, we didn't think his illness was anything more than the flu. Stephen called me while he was at the firehouse one day and described that he felt like something had crawled into his lungs. We immediately scheduled a doctor's appointment. The doctor believed that Stephen simply had bronchitis and prescribed him antibiotics. The antibiotics did not help. The ineffectiveness of the antibiotics led the doctor to perform a CAT scan. The scan revealed lesions on Stephen's lungs. A bronchoscopy was performed, and the doctor's diagnosis now changed to sarcoidosis. Stephen had immense pain in his hips and back which continued to progress. This pain led to a new diagnosis of cancer. The fine needle used to perform the bronchoscopy was unable to penetrate deep enough to reach the cancer which led to the misdiagnosis of sarcoidosis. It was discovered that Stephen's cancer was originally renal cancer that spread throughout his body. On May 29, 2014, he was diagnosed with Stage IV cancer.

9. The physical, emotional, and mental changes Stephen went through over the course of his illness were vast. The blood clots in Stephen's lungs made it very difficult to breathe. He was in a great deal of pain constantly and often needed help with everyday tasks. He could not go to the bathroom on his own. He had great difficulty eating. The chemotherapy made him sick. He had problems performing sexually and eventually was completely sexually impotent due to his radiation treatments. Stephen also experienced paranoia during his illness, which in combination with his sexual impotence, put great strain on our marriage. He was afraid I would leave him or cheat on him. He was afraid any time our girls left the house. He had an overall fear of losing everything. Stephen was afraid but did his best not to show it. There was a

constant state of emotional decline in Stephen and a great depression combined with anxiety. Toward the end, Stephen shut down. He did not want to be seen weak or as the loser of his great fight. In the end, Stephen's greatest worry was not about himself but about his family.

10. Stephen was the kind of man who was always trying to help everyone he could. Friends and family, everyone has a story about him. He is missed at every milestone. He missed his son's wedding. We just found out his son is having a baby who Stephen will never meet. He is missing major milestones. He will miss his daughters' graduation. He was such an involved and loving father that it makes things even more difficult. He is remembered by the community and his coworkers. He was funny and could talk to anyone. No matter who he met, he found common ground and could talk to everyone. He had a promising career as a fireman. It was his passion. He was the love of my life. I am honored I was his wife. Life without Stephen is hard.

  
\_\_\_\_\_  
JENNIFER SKIPTON

Sworn to before me this  
30 day of June, 2022

Christine Staton  
Notary Public  
Expires:  
March 17 2030  
Charleston County



**Estate of Michael Paul Smith Jr.**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF  
FAITH ANN SMITH**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF TENNESSEE )  
: SS.:  
COUNTY OF HAMILTON )

FAITH ANN SMITH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 5822 Dogwood Drive, Harrison, Tennessee 37341.

2. I am currently 67 years old, having been born on July 20, 1954.

3. I am the wife of Michael Paul Smith, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. Michael passed away from metastatic pancreatic cancer on December 25, 2015, at the age of 56. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On January 29, 2016, I was issued Letters of Administration on behalf of my husband's estate by the Chancery Court for Hamilton County, Tennessee.

6. Michael was a great man, father, and husband. We were together for over 30 years and had two sons together. I also had a daughter from a previous relationship, and Michael had a good relationship with her and her father as well. We enjoyed doing many things together

and with our family. For example, we would go out for walks, watch movies and television shows, and go out on our boat. Michael also really enjoyed fishing, and he would go fishing with our sons. He would also take care of everything around the house, such as our yard.

7. My husband was a firefighter, just as his father was and his brother still is. He was at home the morning of the September 11, 2001, terrorist attacks. However, he quickly went into the city that day to help with the search and recovery efforts. He would spend months working at Ground Zero searching for any remains in the debris. And after he stopped working at Ground Zero, he volunteered to continue searching for remains at the Fresh Kills landfill.

8. Working at Ground Zero was something Michael believed he needed to do. He wanted to help find the remains of those missing so that people could have closure. This was important to him, as he had one friend whose remains were never found. He could not stop himself from going to help find other firefighters and those who were in the buildings when they collapsed. He even volunteered to do the shifts of others who could no longer continue working or did not want to continue working at Ground Zero, such as those of his brother.

9. Michael did not speak much of his experience working at Ground Zero. I only heard parts of stories, such as his description of the awful smell there or one time finding a portion of a woman's body. His experience, though, did have an immediate and noticeable impact on him. Emotionally, his personality changed. He was no longer the same happy-go-lucky man that I knew. He became angry, sullen, and introverted. He also struggled with his emotions and his attitude toward things in general. For example, he would get upset over little things, like what we were having for dinner or how dinner was cooked. I felt that we had to walk on eggshells around him. He also began suffering from post-traumatic stress disorder. He put up a wall and withdrew himself.

10. There was also a nearly immediate health impact on my husband. A few days after the attacks, I asked Michael to come home from working at Ground Zero to comfort our sons, who were worried about him. He came home, and I noticed little droplets of blood when he sneezed and that he was coughing up black stuff from his lungs. This cough never went away – it would be with him for over ten years until his eventual death from cancer. He also started

experiencing gastrointestinal issues, and his stomach and esophagus would hurt him. He had Barrett's esophagus and would eat Tums in an effort to treat this pain. Additionally, his eyes bothered him and burned all the time. These issues would not go away.

11. As a result of these health issues, Michael was quickly moved to a desk job at the fire department. He was later forced into retirement. He wanted to get away from New York and so in early 2004, he found a new home for us in Tennessee while on a fishing trip. We would quickly move our family down there.

12. Around the end of 2013 or early 2014, Michael became sick with what we initially thought was the flu. He went to his primary care doctor who prescribed some antibiotics for him. He seemed to get better, but a few weeks later he became sick again with the same symptoms, even worse than before. I could hear fluid in his lungs while he was sleeping and told him to return to the doctor for a chest x-ray to make sure that he did not have pneumonia. He went back for a follow-up, and I told him he could not come home without being able to tell me what is wrong. He would return home with a stack of papers and tell me that, basically, he was dying of cancer.

13. There were spots on his lungs. The x-ray also picked up the lower part of his body and showed something was wrong with his kidney. Eventually, after several more tests and scans, he would be diagnosed with multiple cancers, including kidney, pancreatic, liver, and esophageal cancer. Later, the cancer would also spread to his bones and brain. His body was unfortunately loaded with cancer.

14. His body deteriorated with his cancer despite chemotherapy treatments and an attempt with radiation treatment. This deterioration was very noticeable in the final month or so of his life. He had neuropathy that started in his feet and spread up his legs. He was unable to walk, and it seemed as if he was paralyzed. I had become his full-time caregiver but was unable to move him myself since he was a big man. Fortunately, my sons would come often to help and were able to move him and assist him with his daily business. There was one time, though, where we dropped him while trying to move him to the bathroom. We could not get him up. That was

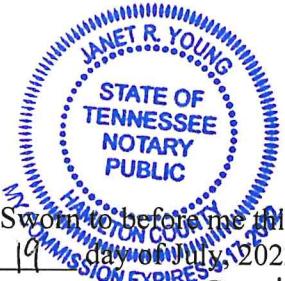
very difficult for us and needing help from his family for daily necessities was humiliating for Michael.

15. Michael's personality changed again with his cancer diagnoses. He resigned himself to the situation and would sleep all day and stay up all night.

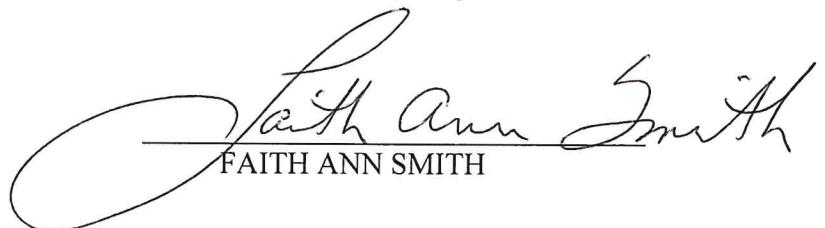
16. Michael was also in constant physical pain. He took many pills each day in an attempt to control this pain, but they never full worked. He was still in pain despite the medication. His brain cancer also affected him mentally, especially at the end of his life.

17. On Christmas day 2015, Michael was not doing well, and so I called an ambulance for him to bring him to the hospital. I followed it there and it became clear to me that he had suffered from a seizure, embolism, or something else. He would die that Christmas in my arms.

18. My family and I were robbed of Michael. My sons will never have a normal Christmas again, and my grandchildren will never have the opportunity to meet their grandfather. Michael will likewise never be able to spend time with his grandchildren like he did with our sons. It is unimaginable the pain he suffered through. 56 years old is too young to die.



Janet R. Young  
Notary Public



FAITH ANN SMITH

## **Estate of Sam Vashovsky**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF  
LANA VASHOVSKY**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK )  
: SS.:  
COUNTY OF NEW YORK )

LANA VASHOVSKY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 630 1<sup>st</sup> Avenue 4H, New York, New York 10016.

2. I am currently 75 years old, having been born on June 5, 1947.

3. I am the wife of Sam Vashovsky, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from brain cancer on November 15, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On May 30, 2014, I was issued Letters of Limited Administration on behalf of my husband's estate in the Surrogate's Court of the County of New York, State of New York.

6. Sam and I were married for forty-seven years. We had a great relationship. We were married on November 5, 1966. We had a beautiful wedding. We had two sons, Ephraim and Stanley. We first lived in Eastern Europe. We were both teachers at a college. Sam was

teaching physics. We went through legal immigration to come to America. We came to America and started to learn English. My husband taught technical engineering, and he worked as a director of biomedical engineering at Bellevue Hospital. I also worked at Bellevue Hospital, as an addiction counselor. Sam and I raised our two children and put them on the right track. Now, our children are both married. My husband was a devoted spouse and great father. Sam had a job in Manhattan, so he sold our house in Brooklyn and moved to Battery Park City.

7. On September 11, 2001, Sam and I lived just two blocks from the World Trade Center, at 380 Rector Place Apt 4N. Before 9/11, my husband was happy to move there. It was a co-operative building, and we bought the apartment in July 2001. We had just finished moving in on September 10<sup>th</sup>, 2001. The moving truck had just left when the disaster started. It was terrifying being so close to the World Trade Center.

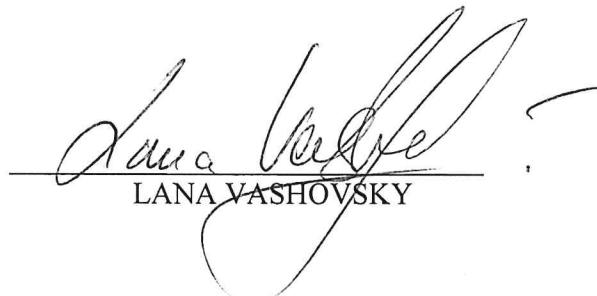
8. Life became extremely difficult after 9/11. It was hard to live in our apartment, which became filled with smoke and dust from the attacks. There was all this black dust in the house and on the balcony. Sam and I were caught in the dust cloud. Sam started to not feel well in the years after 9/11. He was having memory loss, which I thought maybe was age-related. In 2006, one of the doctors made the connection between Sam's condition and living near Ground Zero. They said, "You have to move from that place, it's affecting him." It was frustrating for me to see him not be well, because he had been such a healthy person for a long time. He was an athlete his whole life. He even participated in the Olympics in the 1960s.

9. Sam's mental condition was deteriorating. He became confused. For a while before his mental state began to seriously decline, he was still working. He worked for a medical software company full-time. I had to take him to work in Midtown every morning because he couldn't find his way there. I had to beg him to retire, which he did in 2009. Sometimes, he would wander out of the house onto the street. I would have to call the police to help me find him. He was falling in the house, and sometimes he would hurt me by falling on me. It was hard for me to deal with. One time, the doorman in our building had to help me and Sam after he fell. The doorman told me, "Lana, you have to tell your children that your husband is not well. He needs to see a doctor."

10. In 2011, we took Sam to the doctor for an X-Ray, where he was diagnosed with brain cancer. They told me it was related to 9/11. I was shocked. I asked them how he could be

sick all these years later. They said Sam had probably been declining for years, but because he was a strong person, he kept it together mentally for as long as he could. Sam began to suffer many of the symptoms of brain cancer. He began to walk with a cane because he couldn't move his body like he used to. Then, he had to use a walker. Starting in 2011, he needed to use a wheelchair. He had many more falls, which caused him spinal cord injuries. He also sometimes had difficulties breathing. He was hospitalized twice for his injuries. I had to carry him all over, and he was a heavy guy.

11. Sam left behind a great legacy in his family and friends. He was a very loved husband, father, and grandfather. He missed out on so many occasions and milestones that he should have been here to see.



LANA VASHOVSKY

Sworn to before me this  
14<sup>th</sup> day of July, 2022

Notary Public

